

GARNIER, produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and numbered cause on the 21st day of November, 2024, from 8:59 a.m. to 1:35 p.m., before Naomi R. Peltier, CSR in and for the State of Texas, reported by machine shorthand, at the Airport Business Center, 10100 Reunion Place, 8th Floor, San Antonio, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

MAGNA 
LEGAL SERVICES

Michael Garnier

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<p style="text-align: right;">Page 58</p> <p>1 important to the City.</p> <p>2 A. Certainly. I think that that's -- What it</p> <p>3 sounded to me like, we had heard from our customer base,</p> <p>4 is having more options because there was a need that</p> <p>5 wasn't being filled.</p> <p>6 Q. And Southwest Airlines is a single cabin</p> <p>7 carrier?</p> <p>8 A. That's correct.</p> <p>9 Q. And that's why they were asked to remain in</p> <p>10 Terminal A, because they don't have first class?</p> <p>11 A. No, I think that clubs were a bigger factor,</p> <p>12 but operationally it worked. I mean, that was -- This</p> <p>13 was created well after Corgan's recommendation. And</p> <p>14 Corgan's recommendation had Southwest in Terminal A</p> <p>15 having literally nothing to do with this.</p> <p>16 Q. If that's the case, then why was this created</p> <p>17 at all?</p> <p>18 A. This was created to, as I said, kind of a gut</p> <p>19 check, how do we -- how do we get past this impasse of</p> <p>20 not being able to finalize the gates? So, it's -- Does</p> <p>21 this -- Does this match this (indicating)? Does this</p> <p>22 customer experience match the operational</p> <p>23 recommendation? And if they do, then we should have a</p> <p>24 winner.</p> <p>25 Q. Service, growth, experience, that was also</p>	<p style="text-align: right;">Page 60</p> <p>1 Well, the Bates Number is at the bottom of the page.</p> <p>2 That's the Southwest placement sheet, do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. So, Southwest received zero points on</p> <p>5 "airline club requested," correct?</p> <p>6 A. That's correct.</p> <p>7 Q. And as far as "fit into SAT," Southwest gets</p> <p>8 five points; is that right? That was your decision?</p> <p>9 A. Yes.</p> <p>10 Q. As opposed to American getting seven, correct?</p> <p>11 A. That's correct.</p> <p>12 Q. So, why did Southwest get two points less than</p> <p>13 American with regard to "fit into SAT"?</p> <p>14 A. I think with their no-frills LCC business</p> <p>15 model, it didn't -- it didn't really fit exactly what --</p> <p>16 There is a niche for it, there's a -- there's a market</p> <p>17 for it here, certainly, but the loudest voice that we</p> <p>18 were hearing was wanting that first class, wanting that</p> <p>19 club experience, wanting something different. And so --</p> <p>20 And certainly, there is a huge market for Southwest,</p> <p>21 they're very popular here, but there was just the extra</p> <p>22 components that American Airlines had that they didn't</p> <p>23 have.</p> <p>24 Q. And "service growth and experience," Southwest</p> <p>25 gets six versus American seven. Why the differential</p>
<p style="text-align: right;">Page 59</p> <p>1 allotted seven possible points; is that right?</p> <p>2 A. Okay.</p> <p>3 Q. Is that correct, the highest?</p> <p>4 A. Yes.</p> <p>5 Q. Now, for the first sheet we have here, which is</p> <p>6 Bates Number 3474, that's for American Airlines. Do you</p> <p>7 see that?</p> <p>8 A. Yes.</p> <p>9 Q. And of the airline club request, they were</p> <p>10 allocated the entire seven points; is that right?</p> <p>11 A. Yes.</p> <p>12 Q. And who made that decision? Was that you?</p> <p>13 A. Yes, that's pretty simple.</p> <p>14 Q. And "fit into SAT," you gave them full seven</p> <p>15 out of seven. Why is -- Why did American get the full</p> <p>16 seven out of seven points for that?</p> <p>17 A. Well -- So, they -- they have -- That's -- They</p> <p>18 have the split cabin, they offer the first class, they</p> <p>19 go to major hubs that have international connections.</p> <p>20 It just seemed like that -- they answered what I was</p> <p>21 told that our passengers wanted.</p> <p>22 Q. For comparison purposes, if you don't mind</p> <p>23 skipping ahead and we'll come back --</p> <p>24 A. Uh-huh.</p> <p>25 Q. -- to Bates Number 3483, at the bottom of --</p>	<p style="text-align: right;">Page 61</p> <p>1 there?</p> <p>2 A. Let me take a look here. Do we have notes on</p> <p>3 these?</p> <p>4 Q. There are notes on both of them.</p> <p>5 A. Yes. Okay.</p> <p>6 Q. But as far as your testimony as the</p> <p>7 decision-maker, I'd like to know what -- and please feel</p> <p>8 free to review the notes, but --</p> <p>9 A. Yeah.</p> <p>10 Q. -- once you review them, let me know why</p> <p>11 Southwest didn't get as many points as American on</p> <p>12 "service growth experience."</p> <p>13 A. So, very similar, Southwest, their boarding</p> <p>14 experience is different.</p> <p>15 Q. Not as -- Not as good as American's?</p> <p>16 A. Well, you know, there was an interesting</p> <p>17 Mythbusters that did the boarding experience, and</p> <p>18 Southwest is actually changing their boarding</p> <p>19 experience, so I don't think that that's -- The</p> <p>20 Mythbusters view was that it was not as good of an</p> <p>21 experience. It might have been fast, but it wasn't a</p> <p>22 great customer experience.</p> <p>23 Q. And that -- that's one of the reasons why they</p> <p>24 received less points than American?</p> <p>25 A. I think that having assigned seats, being able</p>